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MEMO ENDORSED

June 23, 2023

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**Via ECF and E-Mail**

Hon. Andrew L. Carter  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007

**Re: *United States v. Barend Oberholzer*, 1:21-cr-00475-ALC**

Dear Judge Carter:

I am writing on behalf of defendant Barend Oberholzer to respectfully request permission that the Court modify Mr. Oberholzer's bail conditions to allow him to travel to Huntsville, Alabama and Nashville, Tennessee for a business trip, leaving June 27, 2023 and returning June 29, 2023. If permitted to travel, Mr. Oberholzer will provide his Supervising Pretrial Officer with a complete itinerary. Pretrial Services, by PTSO Dominique Jackson, takes no position on Mr. Oberholzer's application. The government, by AUSA Jilan Kamal, also takes no position on Mr. Oberholzer's application.

By way of background, on March 2, 2021, Judge Lehrburger released Mr. Oberholzer on a \$500,000 personal recognizance bond secured by two financially responsible persons, with conditions including, inter alia, that Mr. Oberholzer's travel be limited to the Southern and Eastern Districts of New York, and the Central and Southern Districts of California. Since that date, Mr. Oberholzer has remained compliant with the conditions of his release. With the Court's permission, Mr. Oberholzer previously traveled for business to Atlanta, Georgia and Washington, D.C. from March 5, 2023 to March 10, 2023 without incident.

We thank the Court for its consideration in this matter.

Respectfully submitted,

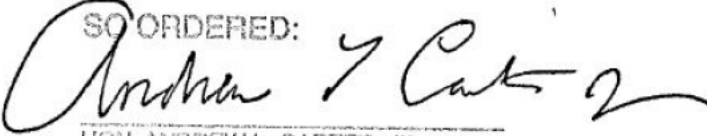
/s/ Ryan P. Poscablo  
Ryan P. Poscablo, Esq.

Hon. Andrew L. Carter

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cc: Jilan J. Kamal, Esq., Assistant United States Attorney (by ECF)  
Domonique Jackson, Pretrial Services (by email)

SO ORDERED:  
  
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HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

Dated: June 26, 2023